MB Docket 08-172 / In the matter of : Development of Devices Capable of Supporting Multiple Audio Entertainment Services.
BRIEF COMMENTS

In summary, I believe it would be ultimately beneficial to all consumers were the FCC to require that all SDARS receivers (e.g. XM and Sirius) be capable of AM/FM DAB ("HD Radio") reception as well.

In their arguments for a waiver of FCC SDARS ownership rules to allow them to merge, XM and Sirius argued that as a service, SDARS competes more with other media technologies than they do with each other. This premise is fundamentally flawed unless every SDARS consumer, by definition, is able to use the same device to access other media technologies.

For the record, I would not be against requiring both SDARS receivers and HD Radio receivers to have store/record and playback features...similar, perhaps, to an iPod or iPod-like audio playback device...but that the inherent licensing and piracy concern issues may outweigh the desired consumer benefits.

Requiring SDARS receivers to have HD Radio reception capability would also provide a convenient means of "jump-starting" the nascent DAB migration for AM and FM. A chief problem with the migration has been the inability for consumers to purchase receivers; what few are available are often very difficult to purchase in a store, and not much easier to purchase on-line. While it arguably is not the FCC's job to stimulate a private business (requiring SDARS to have HD Radio capability would, by default, be a boon for HD Radio's licensor: iBiquity Digital Corporation) it *is* the FCC's job to act in the interest of the public. The FCC has already decided that it is benefit to the consumer to migrate AM & FM reception to a Digital Audio Broadcasting solution, and the iBiquity HD Radio solution has been formally accepted by the FCC, and the National Radio Systems Committee, as the official DAB standard for the United States. Ergo, the FCC has a mandate by default to promote HD Radio for the betterment of consumers.

I do not believe the addition of HD Radio reception will prove prohibitively expensive nor difficult to implement due to size. The chips themselves are just IC chips; not terribly big. The existing displays and concerns on virtually all SDARS receivers can act as software controls for AM/FM reception just as easily. And when done in bulk, the individual costs per unit inevitably drop substantially.

Moreover, since all SDARS receivers will have to be re-tooled to accept transmissions from both XM's and Sirius's satellite networks, this is an excellent opportunity to "get in on the ground floor" as it were, and drastically reduce later implementation costs.

One oft-cited concern is that HD Radio tends to require external antennas to function properly. However, this is no different from SDARS which also effectively requires an external antenna to receive the satellite signal. If necessary, it would be an acceptable compromise to have the SDARS receivers sacrifice internal antennas of any kind in exchange for external antenna jacks (twin-lead for AM, coaxial F type connector for FM – the most common for external antennas).